

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 04-10165-RCL
)
TONY GOMES TEIXEIRA)

GOVERNMENT'S REQUESTED VOIR DIRE QUESTIONS

_____The United States of America respectfully requests that the Court ask prospective trial jurors in this case the following questions:

1. This case was investigated by the Federal Bureau of Alcohol, Tobacco, Firearms and Explosives and the Massachusetts State Police. Is there anything about your attitude towards those law enforcement agencies that would prevent you from fairly and impartially evaluating the evidence and rendering a fair and impartial verdict?

2. The United States of America is the prosecuting authority in this trial. You will hear the United States referred to throughout the trial as "the government." Have you, or any member of your immediate family, or anyone with whom you are close:

- (a) ever been employed by the federal government in any capacity;
- (b) ever filed a lawsuit or claim of any kind against any police or other law enforcement officer; or
- (c) ever filed a claim or lawsuit against the United States or any of its agencies, or answered a claim or lawsuit filed by the federal government?

3. Have any of you or any members of your immediate family been involved in the criminal justice system as a defendant in a criminal case?

4. In this case, the government alleges, in part, that the defendant possessed a firearm and ammunition after having

been convicted of a crime with a punishment in excess of one year. Under the laws of the United States it is illegal for a person convicted of such a crime to possess a firearm or ammunition affecting commerce. Do any of you oppose firearms laws or otherwise hold strong views regarding the regulation or restriction of the possession of firearms or ammunition, such that you may be unable to apply the law as I instruct you, or to be completely fair and impartial juror in this case?

5. Are you aware of any beliefs or feelings which would prevent you from completely and honestly applying the law, as I give it to you at the end of the case, to the facts as you find them?

6. Do you know of any reason why you cannot sit as a fair and impartial juror in the trial of this case?

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Timothy Q. Feeley
TIMOTHY Q. FEELEY
Assistant U.S. Attorney
(617) 748-3172

May 1, 2005

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2005, I will serve a copy of the foregoing on counsel for the defendant, C. Samuel Sutter, Esq. 203 Plymouth Avenue, Building 7, 1st Floor, Fall River, MA 02721, by hand.

/s/ Timothy Q. Feeley
Timothy Q. Feeley
Assistant U.S. Attorney